

1 KAMALA D. HARRIS  
Attorney General of California  
2 KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
3 SYDNEY M. MEHRINGER  
Deputy Attorney General  
4 State Bar No. 245282  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2537  
6 Facsimile: (213) 897-2804  
E-mail: Sydney.Mehringer@doj.ca.gov  
7 *Attorneys for Complainant*

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2013-766

13 **CHRISTINA MAUREEN KAROLL**  
609 Sparrow Court  
14 Troy, IL 62294

**A C C U S A T I O N**

15 **Registered Nurse License No. 739052**

Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
20 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
21 Consumer Affairs.

22 2. On or about October 28, 2008, the Board of Registered Nursing ("Board") issued  
23 Registered Nurse License Number 739052 to Christina Maureen Karoll ("Respondent"). The  
24 Registered Nurse License expired on February 28, 2010, and has not been renewed.

25 **JURISDICTION**

26 3. This Accusation is brought before the Board under the authority of the following  
27 laws. All section references are to the Business and Professions Code unless otherwise indicated.  
28

4. Section 2750 of the Code provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Section 2811, subdivision (b) of the Code provides, in pertinent part, that the Board may renew an expired license at any time within eight years after the expiration.

6. Section 118, subdivision (b), of the Code provides that the suspension, expiration, surrender, or cancellation of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

7. Title 16, Section 1419.3 of the California Code of Regulations defines the period in which a license may be renewed or reinstated:

“In the event a licensee does not renew his/her license as provided in Section 2811 of the code, the license expires. A licensee renewing pursuant to this section shall furnish a full set of fingerprints as required by and set out in section 1419(b) as a condition of renewal.

(a) A licensee may renew a license that has not been expired for more than eight years by paying the renewal and penalty fees as specified in Section 1417 and providing evidence of 30 hours of continuing education taken within the prior two-year period.

(b) A licensee may renew a license that has been expired for more than eight years by paying the renewal and penalty fees specified in Section 1417 and providing evidence that he or she holds a current valid active and clear registered nurse license in another state, a United States territory, or Canada, or by passing the Board's current examination for licensure."

## STATUTES

8. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct, which includes, but is not limited to, the following:

• • • •

1       "(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action  
2 against a health care professional license or certificate by another state or territory of the United  
3 States, by any other government agency, or by another California health care professional  
4 licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that  
5 action."

#### 6                                   **COST RECOVERY**

7       9.     Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
8 administrative law judge to direct a licentiate found to have committed a violation or violations of  
9 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
10 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being  
11 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
12 included in a stipulated settlement.

#### 13                                   **FIRST CAUSE FOR DISCIPLINE**

14                                   (Out of State Discipline)

15       10.    Respondent is subject to disciplinary action under Code section 2761, subdivision  
16 (a)(4) on the grounds of unprofessional conduct in that Respondent's registered nurse license was  
17 disciplined by the State of Illinois, Department of Financial and Professional Regulation, Division  
18 of Professional Regulation ("Illinois Department of Professional Regulation" or "Department"),  
19 as follows:

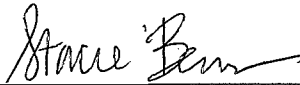
20       11.    On or about July 1, 2010, in the matter entitled *Department of Financial and*  
21 *Professional Regulation of the State of Illinois v. Christina Maureen Karoll, License No.*  
22 *041324303*, case no. 201001291, the Illinois Department of Professional Regulation issued a  
23 Consent Order, based on agreement of the Respondent and the Department, which suspended  
24 Respondent's license for three months and placed her license on indefinite probation for a  
25 minimum of three years, with terms and conditions. The Consent Order was based on the fact  
26 that Respondent admitted that during her employment at Maryville Manor in Maryville, Illinois,  
27 she diverted controlled substances on February 14, 2010. Respondent further admitted that she  
28 had been addicted to pain killers for several years.

**PRAYER**

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 739052, issued to Christina Maureen Karoll;
2. Ordering Christina Maureen Karoll to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and
3. Taking such other and further action as deemed necessary and proper.

DATED: March 14, 2013



for LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

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